

Thimesch Law Offices

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Attorneys for Plaintiff
HOLLYNN D'LIL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HOLLYNN D'LIL,
Plaintiff,

CASE NO. 07-2678 BZ
Civil Rights

v.

EAST WEST CAFÉ; HISAM SHABOON;
DOE TRUST 1; DAVID R. MADSEN;
CARLEEN MADSEN; HARRY E. POLLEY;
JEAN E. POLLEY; and DOES 2 through 50,
Inclusive,
Defendants.

**PLAINTIFF'S REQUEST FOR
DISMISSAL WITH RETAINED
JURISDICTION TO INTERPRET AND
ENFORCE SETTLEMENT
AGREEMENT**

The parties are pleased to report that thanks to the efforts of mediator Kenneth Natkin at two separate mediation conferences and several telephone conferences, they reached a complete settlement in all respects, including plaintiff's claims for injunctive relief, statutory damages, and reasonable statutory attorney fees, litigation expenses and costs. The parties have now memorialized the settlement through written agreement.

Therefore, the parties request that this Court dismiss the action with prejudice, and that the

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1 Court maintain continuing jurisdiction to interpret and enforce the settlement agreement.

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3 Dated: March 27, 2008

THIMESCH LAW OFFICES
TIMOTHY S. THIMESCH, ESQ.
GENE FARBER, ESQ. – Of Counsel

5 /S/ Signature Authorized
Attorneys for Plaintiff
6 HOLLYNN D'LIL

7 **APPROVED AS TO FORM:**

8 Dated: February __, 2008

PETER C. DeGOLIA, ESQ.
CLEMENT, FITZPATRICK & KENWORTHY

10 //Signature Authorized//
Attorneys for Defendants
11 DAVID R. MADSEN, CARLEEN MADESEN, HARRY
E. POLLEY, and JEAN POLLEY

12 Dated: February __, 2008

LESLIE R. PERRY, ESQ.
13 DAPHNE A. BELETSIS, ESQ.
PERRY, JOHNSON, ANDERSON, MILLER &
14 MOSKOWITZ, LLP

15 //Signature Authorized//
Attorneys for Defendants
16 DAVID R. MADSEN, CARLEEN MADESEN, HARRY
E. POLLEY, and JEAN POLLEY

18 **ORDER**

19 SO ORDERED. JURISDICTION IS RETAINED FOR ONE (1) YEAR.

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21 Dated: March 28, 2008


HON. BERNARD ZIMMERMAN
22 U.S. MAGISTRATE JUDGE

